

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

RAYMOND REDLICH, et al.,)	
)	
PLAINTIFFS,)	
)	
v.)	Case No. 4:19-CV-00019
)	
CITY OF ST. LOUIS,)	
)	
DEFENDANT.)	

CONSENT MOTION FOR A PROTECTIVE ORDER

Defendant City of St. Louis, through counsel, hereby moves this Court to enter a protective order protecting documents, other tangible items, and/or testimony relating to confidential and/or proprietary information produced in connection with this matter. In support of its motion, Defendant states as follows:

1. Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), Defendant identified certain documents which it may use to support its claims and defenses. These documents may include police reports with arrestee information, security-sensitive policies, and medical records.
2. Defendant anticipates that additional sensitive and confidential material will be identified and produced in this case.
3. Understanding the reasons for the confidential treatment of certain materials, Defendant believes that a protective order will continue to facilitate discovery in this matter while protecting confidential materials from being made public. A copy of the stipulated proposed protective order is attached as Exhibit A.
4. The protective order will not hinder discovery. Rather it will facilitate the parties' ability to proceed with their respective discovery obligations.

5. Counsel for the Plaintiff has been contacted, reviewed the proposed stipulated order attached as Exhibit A, and consents to the entry of the protective order.

Respectfully Submitted,

JULIAN BUSH
CITY COUNSELOR

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CERTIFICATE OF SERVICE

I hereby certify the foregoing was electronically filed on February 28, 2020 with the Court for service by means of Notice of Electronic Filing upon all attorneys of record.

/s/ Abby Duncan